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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
(FRESNO)**

MARIA LOURDES DELA TORRE,)	Case No.: 1:23-cv-01160-JLT-BAM
)	
Plaintiff,)	REQUEST and PROPOSED ORDER FOR
)	AN EXTENSION OF TIME [FIRST
vs.)	REQUEST]
)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	
)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Complaint be extended from October 3, 2023, up to and including November 9, 2023. This is the Defendant's first request for an extension. Defendant requests this extension because Defendant has been notified that the certified administrative transcript (CAR) is not yet available in this case and more time is required to complete it. Defendant therefore cannot respond to

1 Plaintiff's Complaint. Once the CAR arrives, Defendant will need to review it for defects before
2 submitting it. For these reasons, Defendant asks the Court to approve this unopposed motion and
3 extend the deadline to file a response to Plaintiff's Complaint. Plaintiff does not oppose
4 Defendant's request for an extension of time. The parties further stipulate that the Court's
5 Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,

8 Dated: September 26, 2023

/s/ Jonathan Omar Pena*

(*as authorized via e-mail on 9/26/2023)

Jonathan Omar Pena

Attorney for Plaintiff

11 Dated: September 26, 2023

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

15 By: /s/ Franco L. Becia

Franco L. Becia

Special Assistant U.S. Attorney

Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS HEREBY ORDERED that Defendant shall have
20 an extension, up to and including November 9, 2023, to respond to Plaintiff's Complaint. All
21 other deadlines in the Court's Scheduling Order are modified accordingly.

22 IT IS SO ORDERED.

24 Dated: September 27, 2023

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE